

REMARKS

Applicants have canceled claims 2-3 and 7-12.

Applicants have amended claims 1 and 4 for minor informalities.

Applicants have added new claim 13, which includes the subject matter of claims 1 and 3. The Examiner has indicated that claim 3 is allowable if rewritten in independent form.

The Examiner has rejected claim 1 as being anticipated by Bortolussi. Applicants respectfully disagree.

Bortolussi does disclose a color normalizer for normalizing the color components of the color frame image to produce a normalized color frame image. The present invention takes as an input a color frame image and normalizes the color components of the image to generate a normalized color frame image. The Examiner refers to column 6, lines 40-44 and lines 49-51 of Bortolussi as disclosing a color normalizer. Review of the cited portions of the reference discloses a color table 60 which functions as a face probability look-up table 60 which calculates and saves face probability using histogram of color converted into ST color space. It does not function as a color normalizer as claimed. Further, the Examiner cites Bortolussi at column 16, lines 61-64. A reading of the cited portion of the reference shows that it doesn't take as an input the color frame image and provides a normalized color frame image. That portion of Bortolussi refers to generating an eigenface after detecting a face area, which is after several

processing stages from the frame grabber stage 26, such as the Head Find 28, the Eye Find 30, and the Image Manipulation 34.

Bortolussi also does not disclose a color transformer coupled to the color normalizer wherein the output of the color transformer has pixels whose intensity levels are emphasized corresponding to the moving object. Bortolussi does not disclose a color transformer that takes in as an input the output of the color normalizer. The Examiner cites column 7, lines 3-6 and 47-49 of Bortolussi as disclosing the color transformer as claimed. However, the citations are directed to a detection stage 50 that takes as its input video frame signal 44 from the frame grabber 26. Clearly, the frame grabber 26 is not the same as the claimed color normalizer which provides the input to the color transformer. Additionally, the claimed color transformer is not the same as the detection stage 50 of Bortolussi.

Bortolussi also does not disclose a frame delay coupled to the color transformer for generating a second color transformed frame image. The Examiner points to column 5, lines 47-49 of Bortolussi as disclosing a frame delay as claimed. Applicants respectfully disagree. The citation refers to a spatio-temporal filtering module which takes a sequence of image frames from the camera 40 output of the moving object represented by pixels values having significantly higher luminance than areas of non-motion. There is no disclosure that the spatio-temporal filtering module is a frame delay that takes as an input the output of the first color transform frame image and delays it by one frame.

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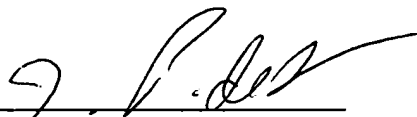
Finally, Bortolussi does not disclose a motion detector that takes in as input the output of the frame delay and the color transformer for detecting the motion of the moving object. The Examiner points to Bortolussi at column 9, lines 14-20 and column 10, lines 36-38 and 45-49. Part of the citations refers to the detection stage 50 which takes as its input the output of the frame grabber 26, and not the color transformer and the frame delay as claimed. The other part of the citations refers to the eye find 30 shown in Figs. 6 and 8 that clearly do not show the claimed limitations.

In view of the above, applicants assert that claim 1 and claims dependent therefrom are patentable over the cited reference and are asserted to be in condition for allowance. Reconsideration of rejection is respectfully requested and an early and favorable action is earnestly solicited.

Applicants hereby request an extension of time for two(2) months through April 7, 2004, in order to timely file this amendment. A check in the amount of \$210.00 is attached herewith for the extension fee.

Please charge Deposit Account No. 19-2105 for any additional fees required to be paid in connection with this submission.

Respectfully submitted,



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